

**KESSLER TOPAZ MELTZER
& CHECK, LLP**

JENNIFER L. JOOST (Bar No. 296164)

(jjoost@ktmc.com)

STACEY M. KAPLAN (Bar No. 241989)

(skaplan@ktmc.com)

BENNETT CHO-SMITH (Bar No. 358260)

(bcho-smith@ktmc.com)

One Sansome Street, Suite 1850

San Francisco, CA 94104

Tel: (415) 400-3000

Fax: (415) 400-3001

*Counsel for SEB Investment Management AB and
Lead Counsel for the Putative Class*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SEB INVESTMENT MANAGEMENT AB, and
WEST PALM BEACH FIREFIGHTERS'
PENSION FUND, Individually and On Behalf of
All Others Similarly Situated,

Plaintiffs,

v.

WELLS FARGO & COMPANY, CHARLES W.
SCHARF, KLEBER R. SANTOS, and CARLY
SANCHEZ,

Defendants.

Case No. 3:22-cv-03811-TLT

**DECLARATION OF STACEY M. KAPLAN
IN SUPPORT OF PLAINTIFFS' REPLY IN
FURTHER SUPPORT OF MOTION TO
CERTIFY CLASS, APPOINT CLASS
REPRESENTATIVES, AND APPOINT
CLASS COUNSEL**

Date: April 29, 2025

Time: 2:00 p.m.

Location: Ctrm. 9, 19th Floor

Judge: Hon. Trina L. Thompson

Case No. 3:22-cv-03811-TLT

**DECLARATION OF STACEY M. KAPLAN IN SUPPORT OF PLAINTIFFS' REPLY IN FURTHER
SUPPORT OF PLAINTIFFS' MOTION TO CERTIFY CLASS, APPOINT CLASS
REPRESENTATIVES, AND APPOINT CLASS COUNSEL**

1 I, Stacey M. Kaplan, declare as follows:

2 1. I am a member of the Bar of the State of California and a partner at the law firm of Kessler
3 Topaz Meltzer & Check, LLP, counsel of record for Court-appointed Lead Plaintiff SEB Investment
4 Management AB (“Lead Plaintiff” or “SEB”) and additional Plaintiff West Palm Beach Firefighters’
5 Pension Fund (“WPB Fire,” and together with SEB, “Plaintiffs”) in the above-captioned action. I submit
6 this declaration in support of Plaintiffs’ Reply in Further Support of Plaintiffs’ Motion to Certify Class,
7 Appoint Class Representatives, and Appoint Class Counsel.

8 2. Attached hereto as **Exhibit 1** is the Expert Reply Report of Joseph R. Mason, Ph.D., dated
9 March 14, 2025.

10 3. Attached hereto as **Exhibit 2** is the transcript of the February 7, 2025 deposition of Joseph
11 R. Mason, Ph.D., dated February 7, 2025.

12 4. Attached hereto as **Exhibit 3** is the transcript of the March 6, 2025 deposition of Amy
13 Hutton, Ph.D.

14 I declare, under penalty of perjury, that the foregoing is true and correct to the best of my
15 knowledge.

16 Executed: March 14, 2025, at San Francisco, California.

17 /s/ Stacey M. Kaplan
18 Stacey M. Kaplan

19 KESSLER TOPAZ
20 MELTZER & CHECK, LLP

21 *Counsel for SEB Investment Management AB and*
22 *Lead Counsel for the Putative Class*
23
24
25
26
27
28